



Privacy Statement

Last updated 2023.07.24

The personal information that KPMG Advisory (China) Limited (“KPMG” or “we” or “us”) collected from you is collected, used, processed and retained in accordance with the Personal Information Protection Law of the People’s Republic of China, and KPMG’s [Online Privacy Statement](#) and [KPMG China Privacy Statement](#).

Please review this privacy statement ("Privacy Statement") to learn more about how in our recruitment services (as defined hereunder) we collect, use, share and protect the personal information we have obtained.

By sending your personal information to us, you accept all the terms and conditions in this Privacy Statement.

1. Collection of personal information

The recruitment business function within KPMG provides permanent and temporary recruitment services to its corporate clients and KPMG’s own internal functions looking to recruit talents for their businesses (“Recruitment Services”). We collect your personal information which you choose to provide us voluntarily through the correspondence between you and us and in your curriculum vitae. Typical types of personal information we collect from job applicants may include but not limited to the individual’s name, contact details, education, employment history, references, languages spoken, proof of professional qualifications, memberships and/or accreditations depending on the nature of the role considered for, career interests and expectations as well as any other information contained in the correspondence and your curriculum vitae as set out in the above.

KPMG only collects sensitive personal information when you voluntarily provide us with this information or where such information is required or permitted to be collected by laws or professional standards. Sensitive personal information, depending on how it is defined under the applicable laws, may include personal information regarding your identification numbers, work permit status, proof of income, race, ethnicity, political beliefs, trade union membership, religious or similar beliefs, physical or mental health, sexual orientation, criminal records, biometric data, specific identity, health data, financial accounts and individual whereabouts location tracking. Please use your discretion when providing sensitive information to KPMG, unless we separately notify you requesting for such information and your explicit consent is obtained (insofar as such consent is required by the applicable law) for KPMG to use or process such sensitive personal information.

We may also collect personal information concerning you from other sources, such as (i) social media sites e.g.: LinkedIn, Liepin (to the extent you have allowed your personal information to be accessible via your authorization to such sites); (ii) publicly accessible sources such as media coverage on your profile and/or your own publications; (iii) third-parties such as your family, close contacts or career service providers who have referred you to KPMG; (iv) a client, affiliate or branch office to KPMG



which may have obtained your prior consent for your personal information to be shared with KPMG for the purposes stated hereunder. Depending on the context, the availability of your personal information to KPMG in such cases will be subject to the privacy policies of such parties or your mutual agreement with them. In the event you believe we have incorrectly obtained your personal information or without due authorization from you via the above sources, you may contact KPMG at cn-fmdataprivacy@kpmg.com.

All collected personal information is used and/or disclosed strictly for the purposes referred to in the following paragraphs.

2. Purposes of processing of personal information

Personal information is used for the purposes below stated.

- (i) **Recruitment Services:** The personal information we collected from you shall allow us to find you suitable or available opportunities by matching your skills, experience and education with a corporate client in search of talent, and to enable our recruiters to assess your eligibility through the different stages of recruitment. Throughout the recruitment process, your personal information will be used for numerous administrative purposes such as communicating your profile to our corporate clients in search of talent, arranging you for interviews, evaluating the results of interviews with the corporate clients and preparing you for onboarding process with a potential employer if a job placement is successful.
- (ii) **Business purposes:** Your personal information may be used for maintaining business relationship where you are a user of our website or a job applicant.
- (iii) **Communications:** We do not use your personal information for direct marketing. We could only send you news and industry updates, event or survey invitations, articles, white papers, newsletters and other information that we feel may be of interest to you because it is relevant to your career if we have your consent to receive such communications from us. You have a right to unsubscribe from such communications by using the unsubscribe link or by contacting KPMG Executive Recruitment consultant.
- (iv) **Compliance purposes:** Personal information may be used to enable KPMG to comply with legal and regulatory obligations and professional standards, including relating to anti-money laundering, terrorist financing, fraud and other forms of financial crime, etc.
- (v) **Administrative information:** Your contact information may be used to notify you about changes to our Recruitment Services or this Privacy Statement (if there are major changes), or other related matters which may reasonably need be communicated with you. We may also contact you to ensure that your personal information in our possession is correct and up to date.
- (vi) **De-identified data:** Personal information may be condensed and anonymised in such a way that the resulting product does not personally identify you or any other individual. After this process, such information is no longer considered personal information. Therefore, it may be used for any purpose, such as market research, data analysis, compiling reports, publishing articles or newsletters, or conducting ongoing validation studies.



We may use your personal information for other purposes only where you have given us your explicit consent.

KPMG collects and processes your personal information for above purposes based on different legal grounds under the applicable data privacy laws. Such legal grounds may include but not limited to performance of a contract (i.e., when the processing of your personal information is necessary for us to perform our obligations toward you in rendering the Recruitment Services), legal obligation, legitimate interests, your consent and other legal grounds or legal principles of the applicable data privacy laws, depending on your location and how you interact with KPMG. Please kindly note that where we do not rely on your consent to process your personal information (so long as we are allowed to do so and relying on another legal ground under the applicable law), we may not seek to obtain your explicit or separate consent in processing, sharing or transfer of your personal information.

3. Sharing of personal information

Our clients

KPMG will share your personal information with our corporate clients, for job opportunities which we think fit, such that the clients' may evaluate, interview, and consider engaging/employing you. Please note that some of the corporate clients may retain your personal information in their databases for future job opportunities.

Our member firms

KPMG may share your personal information with other member firms of the KPMG network and with KPMG International where such sharing of personal information is (a) required or desirable to meet our legal and regulatory obligations around the world;(b) for such member firms to provide services to us and our corporate clients as necessarily required for us to run our business and to fulfil our obligations toward you in our Recruitment Services (e.g., where you entrust us on a job opportunity with its working location / employer's operation in a jurisdiction where one of aforesaid member firms is located; or where your CV had been initially referred to us by another member firm and we need to necessary evaluate and confirm relevant personal information of such kind with such member firms).

Other service providers

KPMG may also share your personal information with our suppliers and service providers outside KPMG network, to assist us in performing Recruitment Services to our corporate clients. These supplier and service providers may include cloud platform providers for the SaaS service, E-mail services providers, VAT Invoice verification service vendor, etc. KPMG will only transfer personal information to them when they meet our strict standards on the processing of data and security and any such services will be provided pursuant to arrangements with the service provider whereby they agree to maintain the confidentiality of your personal information and comply with KPMG's policies regarding the processing of such information. KPMG will not transfer your personal information to any third parties for their own direct marketing use.

Legal reasons

KPMG will disclose your personal information if such disclosure is necessary to:



- meet any applicable law, regulation, professional standard, legal process or other legal obligation;
- audit, detect, investigate and help prevent security, fraud or data security incidents or data breach; and/or
- protect the legitimate rights, property or safety of you, KPMG, our corporate clients, employees or other affected parties; and
- as part of a corporate transaction, such as a transfer of assets to or an acquisition by or merger with another company.

Others agreed by You

KPMG may disclose your personal information to any others when it is explicitly agreed by you.

Except as set forth herein, your personal information will not be sold or made available to other parties for any other purposes.

4. Locations and retention of personal information

Your personal information will be routinely stored and processed by KPMG in Chinese Mainland; subject to above Section 3, we may transfer certain personal information to outside of Chinese Mainland to the extent such cross-border transfer is permitted by law and subject to the fulfilment of the regulatory requirements of the applicable laws. We will make such transfer only in connection with and when necessary for the purposes stated in Section 2 of this Privacy Statement. Such transfer typically occurs when our corporate client is located outside of Chinese Mainland and/or such corporate client's designated recruiter/interviewer/reference check agency (in accordance with its own recruiting standards and process) is located outside of Chinese Mainland.

We make reasonable efforts to retain personal information only for so long (i) as the personal information is necessary for us to provide Recruitment Services and potential services to you and our corporate clients, or (ii) as necessary to comply with legal, regulatory, internal business or policy requirements.

When determining the relevant retention periods, we will take into account factors including:

- a. our contractual obligations and rights in relation to the information involved;
- b. legal obligation(s) under applicable law to retain data for a certain period of time;
- c. statute of limitations under applicable law(s);
- d. if you have made a request to have your information deleted; and
- e. guidelines issued by relevant data protection authorities.

Otherwise, we securely erase your personal information once this is no longer needed.

5. Security and integrity of personal information

KPMG has reasonable security policies and procedures in place to protect your personal information from unauthorized loss, misuse, alteration, or destruction. Despite KPMG's best efforts, however, security cannot be absolutely guaranteed against all threats. To the best of our ability, access to your personal information is limited to those who have a need to know. Those individuals who have access to the personal information are required to maintain the confidentiality of such information.



6. Your Rights

If KPMG processes your personal information, you have the following rights:

- **Access:** You have the right to access to your personal information. This is sometimes called a 'Subject Access Request'. If we agree that we are obliged to provide personal information to you, we will provide it to you free of charge. Before providing personal information to you, we may ask for proof of identity and sufficient information about your interactions with us that we can locate your personal information.
- **Correction:** If the information we hold about you is incorrect, you may ask us to correct any inaccuracies in your personal information.
- **Object to processing:** You have the right to object to us processing your personal information if we are not entitled to use it anymore.
- **Withdrawal of consent:** where we process your personal information on the legal basis of the consent from you, you have the right to withdraw your consent at any time by contacting KPMG via the email below (note: withdrawal of consent does not affect the validity of our consent-based personal information processing prior to the withdrawal).
- **Deletion:** in addition, you may have rights to have your information deleted if we are keeping it too long, have its processing restricted in certain circumstances and/or to obtain copies of information we hold about you in electronic form.

You can make a request or exercise these aforementioned rights by contacting KPMG Executive Recruitment consultant or by sending an email to cn-fmdataprivacy@kpmg.com. Before processing your request, to protect your privacy, we may ask for proof of identity and sufficient information about Your interactions with us so that We can locate your personal information. We will make all reasonable and practical efforts to comply with Your request, so long as it is consistent with applicable law and professional standards.

7. Your warrant

If the personal information you provide contains personal information of other data subjects, you warrant that:

- you have obtained all necessary consent as required in accordance with the relevant applicable law from such data subjects prior to you disclosing of their personal information to us as well as to our third-party service providers.
- such consent from other data subjects covers the same scope as you have granted your consent hereunder with respect to your own personal information.
- you shall indemnify KPMG for all losses, damages, costs and expenses arising from your breach of any terms set out in this Privacy Statement.

8. Changes to this Privacy Statement



KPMG may modify this Privacy Statement from time to time to reflect our current privacy practices. When we make changes to this Privacy Statement, we will indicate the issuance date of the updated Privacy Statement. . Where applicable, we will notify you by email of any material changes to the Privacy Statement. We recommend that you check the terms of this Privacy Statement periodically to keep up to date with any changes.

9. How you can contact us

KPMG is committed to protecting your personal information. If you have any questions or comments about how your personal information are being handled or processed, please contact KPMG Executive Recruitment consultant or send your enquiry to cn-fmdataprivacy@kpmg.com.